

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

MIDWEST PILOTS MERGER)	
COMMITTEE,)	
CARL SCHWERMAN,)	
DONALD TILL,)	
<i>and</i>)	
MARK E. WARD,)	
<i>Plaintiffs,</i>)	Civil Action No. 2:14-cv-01441-RTR
)	
<i>v.</i>)	
)	
FRONTIER AIRLINES, INC.)	
<i>and</i>)	
FRONTIER AIRLINE PILOTS)	
ASSOCIATION,)	
<i>Defendants.</i>)	
)	

**UNOPPOSED MOTION BY PLAINTIFFS FOR A SECOND
EXTENSION OF TIME TO RESPOND TO MOTIONS TO DISMISS**

Plaintiffs Midwest Pilots Merger Committee (MPMC) *et al.* respectfully request that they be granted an additional extension of time in which to file their opposition to defendants' separate motions to dismiss. Plaintiffs' oppositions are currently due by February 13, 2015, and by this motion plaintiffs ask that they be granted an extension of one business day to and including February 17, 2015, in which to file their oppositions. Plaintiffs state as follows in support of this motion.

Plaintiffs responses to defendants Frontier Airlines, Inc.'s and Frontier Airline Pilots Association's separate motions to dismiss was initially due on or before February 9, 2015, but on February 9, this Court granted plaintiffs' unopposed motion for an extension to and including February 13, 2015. Due to other matters which required his attention during this past week, counsel for plaintiff has not been able to complete the opposition so that it might be filed by its current due

date, and, accordingly, plaintiffs ask that they be granted an additional extension so that they will have until the next business-day, Tuesday, February 17th, in which to file their opposition.

Plaintiffs submit that this extension will neither delay a prompt resolution of this case, nor deprive defendants of an adequate time in which to reply to plaintiffs' opposition, since defendants have to and including March 31, 2015, in which to reply. Additionally, counsel for plaintiffs has informed counsel for defendants that this motion would be made and has been authorized to state that defendants will not oppose this motion.

WHEREFORE, plaintiffs respectfully request that they be granted an extension of one business day (that is, an extension to and including February 17, 2015) in which to file their opposition to defendants' motions to dismiss.

Respectfully Submitted,

/s/ John O'B. Clarke, Jr.
John O'B. Clarke, Jr.
HIGHSAW, MAHONEY & CLARKE, P.C.
4142 Evergreen Drive
Fairfax, Virginia 22032-1018
Phone: (202) 296-8500
Fax: (202) 296-7143
Email: jclarke@highsaw.com

Date: February 13, 2015

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this 13th day of February, 2015, caused a copy of this Unopposed Motion For A Second Extension Of Time to be served upon counsel for defendants through the Court's Electronic Case Filing system.

/s/ John O'B. Clarke, Jr.
John O'B. Clarke, Jr.